

Exhibit F

Page 1

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

LAUREN ROLLINS,
Plaintiff,
vs. Civil Action No. 3:22-cv-30059
R STREET INSTITUTE,
Defendant.

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11 DEPOSITION OF
12 LAUREN L. ROLLINS
13 Wednesday, May 3, 2023
14 10:39 a.m.
15 Jackson Lewis P.C.
16 75 Park Plaza
17 Boston, Massachusetts 02116

23 Laurie K. Langer, RPR

Page 2

1 APPEARANCES
2

3 ON BEHALF OF THE PLAINTIFF(s) :

4 BY: Deborah McKenna, Esq.

5 Hayber McKenna & Dinsmore, LLC

6 472 Wheelers Farm Road

7 Milford, Connecticut 06461

8 (203) 691-6491

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10

11 ON BEHALF OF THE DEFENDANT(s) :

12 BY: Benjamin R. Davis, Esq.

13 JACKSON LEWIS PC

14 75 Park Plaza

15 Boston, Massachusetts 02116

16 (617) 367-0025

17 benjamin.davis@jacksonlewis.com

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Page 3

1 INDEX OF EXAMINATION
2

3 WITNESS: Lauren L. Rollins

4 EXAMINATION PAGE NO.
5 By Mr. Davis 4
6

7 INDEX TO EXHIBITS

8 NO. DESCRIPTION PAGE NO.
9 Exhibit 1 Résumé 53
10 Exhibit 2 MCAD Charge of Discrimination 54
11 Exhibit 3 E-Mail Chain and Attached 87
12 Raise Request Memo
13 Exhibit 4 10/17/19 E-Mail to 124
14 Erica Schoder
15
16 (Original exhibits attached to original transcript)
17
18
19
20
21
22
23
24

P R O C E E D I N G S

MR. DAVIS: So I don't know if the usual stipulations in Connecticut are the same as Massachusetts, but are you comfortable with all objections, except as to form, being waived until the --

MS. MCKENNA: Yeah.

9 MR. DAVIS: Reserved until the time of
10 trial. 30 days to read and sign the transcript. And
11 waiving notary.

12 MS. MCKENNA: Yes, to all three of those.

13

LAUREN L. ROLLINS,

15 having been satisfactorily identified by the production
16 of her driver's license, and duly sworn by the Notary
17 Public, was examined and testified as follows:

18

19

EXAMINATION

21

BY MR. DAVIS:

23

Q. Good morning, Ms. Rollins.

24

A. Good morning.

1

REDACTED

15 A. Okay. So in terms of the time periods -- I'm
16 neuro divergent. So for me to fix months and dates in
17 time in the past specifically is very difficult for me
18 without something to cross reference.

19 Q. Okay.

20 A. So that is the source of me not being sure about
21 when exactly. Also, this was an ongoing process, and I
22 had to make several requests of different people because
23 my boss was changing so often.

24 Q. Yep.

Page 220

1

CERTIFICATE

2

3 COMMONWEALTH OF MASSACHUSETTS

4 SUFFOLK, ss.

5

6 I, Laurie Langer, Registered Professional Reporter
and Notary Public in and for the Commonwealth of
7 Massachusetts, do hereby certify that the witness whose
deposition is hereinbefore set forth, was duly sworn by
8 me and that such deposition is a true record of the
testimony given by the witness.

9

10

11 I further certify that I am neither related to or
employed by any of the parties in or counsel to this
action, nor am I financially interested in the outcome
12 of this action.

13

14

In witness whereof, I have hereunto set my hand and
seal this 15th day of May, 2023.

15

16

17

18


NOTARY PUBLIC

19

Commission Expires

20

7/27/2023

21

22

23

24

Page 221

1 DEPOSITION ERRATA SHEET

2

3 Our Assignment No: 5896239

4 Case Caption: Rollins vs. R Street

5

6 DECLARATION UNDER PENALTY OF PERJURY

7 I declare under penalty of perjury that I have
8 read the entire transcript of my Deposition taken in the
9 captioned matter or the same has been read to me, and
10 the same is true and accurate, save and except for
11 changes and/or corrections, if any, as indicated by me
12 on the DEPOSITION ERRATA SHEET hereof, with the
13 understanding that I offer these changes as if still
14 under oath.

15 Signed on the _____ day of _____ 2023

16

17

18 LAUREN L. ROLLINS

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Page 222

1 DEPOSITION ERRATA SHEET

2 Page No. _____ Line No. _____ Change to: _____

3 _____

4 Reason for change: _____

5 Page No. _____ Line No. _____ Change to: _____

6 _____

7 Reason for change: _____

8 Page No. _____ Line No. _____ Change to: _____

9 _____

10 Reason for change: _____

11 Page No. _____ Line No. _____ Change to: _____

12 _____

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16 Reason for change: _____

17 Page No. _____ Line No. _____ Change to: _____

18 _____

19 Reason for change: _____

20 Page No. _____ Line No. _____ Change to: _____

21 _____

22 Reason for change: _____

23 SIGNATURE: _____ DATE: _____

24 LAUREN L. ROLLINS

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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